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Attorneys For Plaintiffs

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY**

BORIS GOLDENBERG, REINALDO  
PACHECHO, ANDREW LEOW and  
GERALD COMEAU, as representatives of  
a class of similarly situated persons and on  
behalf of THE INDUCTOTHERM  
COMPANIES MASTER PROFITS  
SHARING PLAN #001,

Plaintiffs,

vs.

INDEL, INC., individually and a/k/a  
INDUCTOTHERM INDUSTRIES, INC.  
and INDUCTOTHERM CORPORATION;  
AMERICAN INTERNATIONAL GROUP,  
INC.; FSC SECURITIES  
CORPORATION; FINANCIAL SERVICE  
CORPORATION;  
SUNAMERICA ASSET MANAGEMENT  
CORP.; SUNAMERICA CAPITAL  
SERVICES, INC.; SUNAMERICA FUND

**Docket No. 1:09-cv-05202-JBS-AMD**

**Civil Action**

**NOTICE OF MOTION FOR LEAVE TO  
FILE SECOND AMENDED CLASS  
ACTION COMPLAINT AND JURY  
DEMAND**

**RETURNABLE: MAY 2, 2011**

SERVICES, INC.; WHARTON  
BUSINESS GROUP;  
HENRY M. ROWAN, JOHN H.  
MORTIMER, DAVID L. BRADDOCK,  
THOMAS P. MCSHANE, MANNING J.  
SMITH,  
LAURENCE A. KRUPNICK, AND  
HARRY G. TREFZ, as Trustees to the  
Inductotherm Companies Master Profit  
Sharing Plan #001; JOHN DOES 1-25  
(Individuals Serving on the Board of  
Directors of Indel, Inc. whose names are not  
currently known); JOHN DOES 26-50  
(Individuals Serving on the Board of  
Directors of Inductotherm Industries Inc.  
whose names are not currently known);  
JOHN DOES 51-75 (Individuals Serving on  
the Board of Directors of Inductotherm  
Corporation whose names are not currently  
known); JOHN DOES 75-125 (Members of  
the Committee for the Inductotherm  
Companies Master Profit Sharing Plan  
#001, whose names are not currently  
known); and John Does 126-200 (Other  
fiduciaries for the Inductotherm Companies  
Master Profit Sharing Plan #001 and  
parties whose names and identities are not  
presently known to Plaintiffs that were  
enriched by the receipt of the Plan's assets),

Defendants.

PLEASE TAKE NOTICE that on May 2, 2011, or as soon thereafter as the matter may be heard, the undersigned attorney for Plaintiffs Boris Goldenberg, Reinaldo Pachecho, Andrew Leow and Gerald Comeau, as representatives of a class of similarly situated persons and on behalf of the Inductotherm Companies Master Profits Sharing Plan #001, will apply to the United States District Court, District of New Jersey, at the United States Court House located at 4<sup>th</sup> &

Cooper Streets, Room 1050, Camden, NJ 08101, for an Order granting leave to file their Second Amended Class Action Complaint in this matter.

***PLEASE TAKE FURTHER NOTICE*** that the undersigned shall rely upon the accompanying Declaration of Robert L. Lakind and Plaintiffs' brief in support of this motion.

SZAFERMAN, LAKIND,  
BLUMSTEIN & BLADER, P.C.  
Attorneys for Plaintiffs

s/R.Lakind  
Robert L. Lakind, Esq.

Dated: April 8, 2011

**CERTIFICATE OF SERVICE**

This is to certify that the within and foregoing was filed with the Clerk of the Court using the ECF system, which will automatically provide notice to the following attorneys of record by electronic means:

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This 8<sup>th</sup> day of April, 2011.

s/R.Lakind  
Robert Lakind, Esq.